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U.S. Department of Justice

Environment and Natural Resources Division

DJ#90-11-2-1109

Environmental Enforcement Section
P.O. Box 7611
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August 10, 1998

VIA U.S. MAIL & FACSIMILE

Charles M. Denton, Esquire
Varnum, Riddering, Schmidt & Howlett, L.L.P.
Bridgewater Place
333 Bridge Street, N.W.
Grand Rapids, Michigan 49504

Re: United States v. City of Albion, Michigan et al.,
Civ. No. 1:97-CV-1037 (W.D. Mich.) - City of Albion
Employee Depositions/Interviews.

Dear Mr. Denton:

As we discussed on our telephone call on August 7, 1998, attached is a list of current and former City of Albion, Michigan employees/council members we wish to interview and/or depose in the above-referenced case. I understand that you are prepared to assist in scheduling interviews and/or depositions with these persons. The list identifies the year of employment, the individual's position, address and telephone number, to the extent we have this information. Please contact the first four persons on the list, i.e., Messrs. William Rieger, Neal Godby, Lee Davis and Charles Jones, for the purpose of scheduling depositions with these individuals during the next three weeks (August 10 - 28, 1998). We will notice the parties and issue subpoenas, once deposition dates have been confirmed by you.

In addition, please confirm addresses and telephone numbers, provide me with missing addresses and telephone numbers, and confirm former (or current) City of Albion employee/council member employment of the remaining individuals on the list. Our intent is to interview these individuals by telephone during the next two weeks and determine whether depositions will be necessary. Please let me know whether you will participate in the interviews through telephone conferencing. The telephone interviews will be conducted by Ms. Evette Jones, Civil Investigator, U.S. EPA, Region 5, Chicago, IL.

Thank you for your assistance in this matter. I look forward to your expeditious response. Please do not hesitate to call if there are any questions regarding this letter, or this matter.

Sincerely,

Lois J. Schiffer
Assistant Attorney General
Environment and Natural Resources
Division

By: *Francis J. Biros*
Francis J. Biros
Trial Attorney

cc: Kathleen K. Schnieders, Asst. Regional Counsel, U.S. EPA.

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Potential Deposition/Interview List:

1. William Rieger (Albion City Manager - 1966)
Cold Water, Michigan
(517) 238-2045
2. Neal Godby (Albion City Manager - 1972)
(906) 635-9455
3. Lee Davis (Albion City Manager - 1978)
4. Charles Jones (Albion Mayor - 1975)
38040 Euclid
Willoughby, Ohio 44094
(440) 946-9728
5. John Brundage (Albion City Attorney)
303 W. Mansion
Marshall, Michigan
(616) 781-7116
6. John Parker (believed to be former Albion City employee)
906 Bogel Drive
Apartment 4
Albion, Michigan
(517) 629-5698
7. Robert Hunt (believed to be former Albion City employee)
3561 28 Mile Road
Albion, Michigan 49224
(517) 629-4386

OR

Robert W. Hunt
3561 Duck Lake Road
Albion, Michigan 49224
(517) 629-4386

8. Roger Klein (former Albion City Council member)
7929 W. St. Joseph
Lansing, Michigan
(517) 627-4034

9. Allan Gauss (former Albion City Council member)
1949 Charlotte Landing
Albion, Michigan
(517) 857-3295
10. Barry Ewbank (former Albion City Council member)
Kalamazoo, Michigan
11. Councilman Romanchuck (former Albion City Council member)
215 W. Pine Street
Albion, Michigan
(517) 629-4229
12. Kevin Markovich (Albion City Superintendent of Public
Utilities)
508 Irwin Avenue
Albion, Michigan
(517) 629-8843

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U.S. EPA, Region 3
Office of Regional Counsel